

PRIVACY POLICY

Last updated: February 26, 2018

Introduction

This privacy policy describes how Vanward OÜ («Company», «we», «us», «our») in accordance with the Regulation of the European Parliament and of Council No. 2016/679 as of April 27, 2016. and other applicable legal norms collects, stores, uses and protects your personal data using or interacting with Tsrpay.com (Website).

Company cannot comply the requirements of the normative acts of all the jurisdictions throughout the world. By using the Websites and Services, you agree to comply with the law of your jurisdiction and bear sole responsibility for the non-compliance.

By using the Websites, you knowingly and unconditionally give Company the consent to collect, use and transfer your personal data in accordance with this Privacy Policy, and accept the Terms of Service.

At any time, you can withdraw your consent to the processing of personal data, which does not affect the validity of the data processed prior to the moment of withdrawal.

Please read our Privacy Policy carefully to get a clear idea as to why and how we collect, use, protect or otherwise handle your personal data.

Company may amend this Privacy Policy. If significant changes are made, Company will issue a notice to enable you to review the changes before they come into force. If you do not agree with any changes, you can close your account. By continuing using the Company Services after publishing or sending notice of changes to this Privacy Policy, you hereby agree to the updated Privacy Policy.

1. Collected information

1.1. Information you provide to Company

Registration

You provide the information necessary to create and protect your account, including your email address and password.

Profile

If you wish to purchase tokens, you may be asked to include in the profile a true identifying information such as your first and last name, date of birth, citizenship, country and address and provide proof of identity, source of funds, etc. directly or through a third party with the purpose of fulfilling the requirements of the normative acts on the prevention of money laundering and terrorist financing (AML), and the implementation of KYC / CDD procedures. Company has the right to verify and receive from third parties the information submitted by you.

To purchase tokens, you will also need to specify the payment method and payment details (for example, the address of the digital wallet or bank account).

You are responsible for the relevance and authenticity of the information specified in the account. You are not entitled to use the Company Services unless you are 18 years of age or older.

Submission and upload

Company collects your personal data, including when you submit, insert, or upload it during the use of the Services, for example when uploading an identity confirmation or residence address.

1.2. Cookies, web beacons and similar technologies

Company can use cookies and similar technologies (for example, web beacons, one-pixel images, ad tags and device IDs) to recognize you and / or your device (s) as a returning user, customize services, content and advertising, evaluate the results of marketing activities and collect information about your computer or another access device. You can manage cookies in your browser settings and through other means.

1.3. Your device and location

When you access or exit Company Websites (including plug-ins or cookies, and similar technology from third-party websites), Company obtains the URL of the website from which you logged in and the website to which you transferred. In addition, Company also receives information about your IP address, proxy server, operating system, web browser, add-ons, device identifier, and capabilities, and/or an Internet service provider or mobile operator. When using Company Websites from a mobile device, this device sends Company information about your location. Most devices enable you to prevent from sending location data to Company. In this case, the Company will be guided by your settings.

1.4. Other

If Company begins to collect fundamentally different personal data or significantly changes the way your data is used, Company will notify you, and may also amend this Privacy Policy.

2. Ways of using your data

2.1. Communications

To communicate with you, e-mail, notifications on Company websites, messages will be used. Company will send you messages about security and other aspects of providing the Services. In addition, Company sends reminders and advertisements from Company and Company partners. Please note that you cannot refuse to receive service messages from Company, including security notifications and other applicable notifications.

2.2. Marketing

Company uses Participant data and related content in invitations and messages aimed at promoting the participation and expansion of the network, involvement and Company Services.

2.3. Support service

Company uses the data (including, likely, your messages) necessary to respond to claims and questions about the Services (for example, errors), as well as for their consideration and solution.

2.4. Aggregated statistics

Company uses your information to obtain aggregated statistics that does not allow you to identify yourself. For example, Company can use your data to generate statistics relating to visitors to Company sites, their profession or industry, and the distribution of website users by demographic characteristics.

2.5. Security and investigations

Company uses your data (including your messages), if necessary to ensure the security or investigation of potential fraud or other violations of the Company Terms of Service or this Privacy Policy and / or attempts to cause harm to Company Participants and Visitors.

2.6. Storage and use of information

Company will store your information in its database for the purpose of providing the Services. Company has the right to conclude a contract with third parties for the purpose of storing and processing information. Company also has the right to transfer information to a company that is part of the Company group.

Company will not sell or share your information for the marketing purposes to third parties without your explicit consent.

3. Dissemination of information

3.1. Service providers

Company involves third parties in the provision of the Services (for example, maintenance, analysis, audit, payment, detection of fraud, marketing and development). They access your data to the extent that it is reasonably necessary to perform these tasks on behalf of the Company. They are bound by the obligation to Company not to disclose or use this data for other purposes.

3.2. Disclosure by virtue of the law

It is possible that Company will be required to disclose information about you in accordance with legal requirements, subpoena or other judicial processes, and in cases where the Company has reason to believe that disclosure is necessary for: (1) investigation, prevention of or action against alleged or actual offenses or to assist state law enforcement agencies; (2) enforcing the terms of any agreements with you; (3) investigation of any claims or charges from third parties and defense from them; (4) ensuring the security and integrity of the Company Services (for example, by providing access to companies facing similar threats); (5) implementing or protecting the rights or security of Company, Company Participants and employees or others. Company strives to notify the Participants of the properly stated requirements regarding their personal data when it considers it appropriate, unless it is prohibited by law or by order of the court, and also if the request is not urgent. The Company can challenge such claims if it considers that these requests are excessively broad, unclear or lack the proper authority. However, Company does not promise to challenge every claim.

4. Rights and obligations of the Participant

4.1. Saving data

Company keeps personal information provided by you as long as your account exists or as long as it is necessary to provide you with the Services if there is no legal requirement to save data for a longer period of time. Company saves your data and stores your profile until you decide to close your account. Individual data are retained for a period of time specified by the requirements of normative acts. In some cases, the Company can store individual data in anonymized or aggregated form.

4.2. The right to access, monitor, modify, transfer and delete your personal data

Company provides various tools for managing your data - from changing or correcting data included in your profile. You can view or edit personal information in your account. You can delete personal information or your account by contacting Company Customer Support.

The Participant is entitled to use the right to data portability by contacting Company support and undertaking all necessary steps to confirm his identity.

4.3. Closing an account

You have the right to request the termination of processing your data.

If you decide to close your Company account, your personal data will be deleted within 30 days from the date of your application, except for the cases listed below.

Company stores your personal data even after the account closure, if it is reasonably necessary to fulfill Company legal obligations (including law enforcement requests), legal requirements, as well as to resolve disputes, ensure security, prevent fraud or abuse, enforce the provisions of the Company Terms of Service or to fulfill your request to refuse further communications from Company.

5. Other important information

5.1. Security

Company implements security measures to protect your data, in particular, the HTTPS protocol. Company regularly checks its systems for vulnerabilities and attacks in order to ensure the adequate security of your data, including protection against unauthorized and illegal processing and against accidental loss, destruction or damage, using appropriate technical and organizational measures.

Reliable protection of your information is a prerequisite for our work. Your personal data is stored in a secure storage and is subject to special protection by SSL encryption. (Secure Sockets Layer). Profiles of our users are not indexed by search engines. Access to your information is available only to those employees who carry out verification of your identification.

5.2. Contact Information

Any questions or claims regarding this Policy should be sent via email to contact@Companypay.com. You can also send them by regular mail. If no response is received or if its content does not satisfy the sender, you can use other settlement options.